

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

*

v.

*

Case No. SAG-23-0128

TYQUAN FORD

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* * * * *

THIRD CONSENT MOTION TO MODIFY CONDITIONS OF RELEASE

Now comes the Defendant, Tyquan Ford, by his attorney, Law Offices of Gerald C. Ruter, P.C. and requests this Honorable Court enter an Order that modifies his current conditions of release for the purpose of cashing personal checks at a local Walmart and for reasons states as follows:

1. Mr. Ford is charged by indictment with possession of a controlled substance with intent to distribute.

2. Mr. Ford had his initial appearance on April 20, 2023, and was released with conditions and is under the supervision of Pre-trial Services with no permission to leave his residence without court approval.

3. Mr. Ford has been totally compliant with all conditions.

4. Mr. Ford sought permission to attend a scheduled appointment with the Motor Vehicle Administration located on Ritchie Highway, Glen Burnie, Maryland, on November 17, 2023, for the purpose of obtaining a Maryland Identification Card as

well as a second permission to attend Thanksgiving dinner with his family on November 23, 2023. Those requests were granted by the Court, and both exercised without incident.

5. Mr. Ford now requests permission to leave his residence for the purpose of cashing personal checks at a Walmart store on Friday, December 1, 2023, at the direction of Pre-Trial Services. He will be transported by his third-party custodian, Ms. Talya Simms.

6. The government, through Assistant United States Attorney LaRai Everett and United States Pre-trial Services Officer Vicky Adams, has no opposition to this request.

WHEREFORE, it is prayed the Court grant the relief requested.

Respectfully Submitted,

/S/ Gerald C. Ruter

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Certificate of Service

I HEREBY CERTIFY that on this 29th day of November 2023, a copy of the foregoing was electronically delivered to all counsel of record.

/S/ Gerald C. Ruter

Gerald C. Ruter